

THIERRY GUETTA

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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN,

Plaintiff,

vs.

THIERRY GUETTA a/k/a
MR. BRAINWASH; and DOES 1
through 10, inclusive,

Defendants.

Case No.
CV10-0014-DDP (JCx)

VIDEOTAPED DEPOSITION OF

THIERRY GUETTA

Monday, November 15, 2010

Reported by: Irene Nakamura,

C.S.R. No. 9478, RPR, CLR

ORIGINA

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10:45 1

THE DEPONENT: Okay.

13:10:45 2

MR. GUTMAN: Stick to the question, just
give him a response.

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THE DEPONENT: It's not -- it's not just
about Run DMC. You know, you are talking about
Run DMC, Run DMC, Run DMC. There is an artist
behind, you know. I am an artist. This is a piece
of art. It's not a Run DMC. If they wanted
something Run DMC, they go to buy it, any posters
or any photos of -- they came here to see me. Not
Run DMC.

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You know, it's part of the -- a movement.

It's part of a freedom of expression, a freedom
of -- of being an artist, of doing something. And
it's like having a statement in Los Angeles, if you
look of the show that I made. It's not words about
money. It's about to make a -- a -- a statement of
the world, of Los Angeles, about a show.

And like if you look at the money that I
made and the money that I spent at the time, you
can look at it, and you'll see that I was not so
much a winner of it. But --

MR. GUTMAN: You got to --

THE DEPONENT: Okay.

MR. GUTMAN: -- stick to the question.

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19:26 1 A. I rent a space in one of the first motion
13:19:31 2 pictures of Los Angeles building, 1911, that was
13:19:37 3 C.B.S., that was abandoned for the last year that
13:19:41 4 I just put in shape. And it took me two or three
13:19:44 5 months to make it happen, you know.

13:19:47 6 Q. Anything else that you can think of,
13:19:49 7 specifically?

13:19:49 8 A. I have -- no, I don't recall. You know, I
13:19:54 9 don't recall. A lot of thing happens at that time.

13:19:57 10 Q. And you created the postcards in order to
13:20:00 11 help create excitement for the show?

13:20:02 12 A. No, to trying to give something that I've
20:04 13 done, you know. To give something for free.

13:20:07 14 Q. And that was to get your fans excited?

13:20:11 15 A. No. To -- to -- to just to be -- to be --
13:20:21 16 to be able to -- to -- to give something, you know.
13:20:25 17 To give something about this -- this moment.

13:20:35 18 You know, you don't do like 50 or 30 or
13:20:37 19 40 different postcards, print it, and give it to
13:20:42 20 people, you know. I mean, it's -- it's not what
13:20:44 21 you see in a show.

13:20:45 22 I was trying to -- to make a statement,
13:20:49 23 you know. Art, it's about not just making, but
13:20:53 24 giving.

13:21:00 25 Q. Okay.

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21:01 1

A. You know, I got --

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MR. GUTMAN: Let's just stick --

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THE DEPONENT: Okay.

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MR. GUTMAN: -- with question and answer.

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THE DEPONENT: Okay.

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MR. GUTMAN: "Okay" is not a question.

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MR. LINDE: I'll mark as Exhibit 16, a

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three-page collection of documents --

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THE DEPONENT: Okay.

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MR. LINDE: -- and I will ask you to take

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a look at that.

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(Whereupon, Plaintiff's Exhibit No. 16

13

was marked for identification by the

14

deposition officer and is attached

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hereto.)

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THE DEPONENT: Okay.

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BY MR. LINDE:

13:21:44 18

Q. Do you recognize that as a postcard --

19

A. Yeah.

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Q. -- for your show?

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A. It's one of the postcards. One of the 50

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or 40 or -- 40 postcards.

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Q. Okay. How many postcards do you believe

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there were?

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A. Normally, we print a -- a thousand of

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21:57 1

them.

13:21:57 2

Q. Okay. You've -- and you think there

13:22:00 3

was -- before you said there was between 30 and 40

13:22:02 4

varieties.

13:22:03 5

Now, you think there is 50 to 60

13:22:04 6

varieties?

13:22:05 7

A. It could be. I don't recall.

13:22:06 8

Q. Do you have an estimate?

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A. Of different -- different artwork.

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Q. Was there a --

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A. It was not --

13:22:12 12

Q. -- postcard of every artwork in the show?

22:14 13

A. No.

13:22:15 14

It was more of the artwork than 50.

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Q. So only certain pieces of art got a postcard; correct?

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13:22:21 17

A. It was just what happened in the beginning, yeah. Yes.

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13:22:25 19

Q. How did you select what artwork would go on the postcard?

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13:22:30 21

A. It just happens, you know. It was not really like a selection and thinking about. It just happened in the moment.

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Q. Well, you wanted to put some of your best artwork on the postcards; correct?

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22:37 1

A. It's not best artwork, because I'm sure that some of the best artwork never got the postcard.

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Q. You were --

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A. It was just at the moment what -- what was in front of me eyes.

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Q. The artwork that you put on the postcards was artwork that you thought was attractive; correct?

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Q. And you decided to make a postcard of the Run DMC Old Family --

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A. Yes.

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Q. -- because you thought that would help create excitement for your show; correct?

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Q. All right.

13:23:21 23

13:23:26 24

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A. It's one piece of art of Mr. Brainwash. That's what it is. It was not like because of them that I'm having mixed with 50 other postcards, you

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23:34 1

know. It's -- it's just one of them, you know.

13:23:35 2

Q. Did you ever do a study to determine how effective the postcards were in drawing people to your show?

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A. No. We didn't. Because -- because it was done after the show that was opened.

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It was given end of show. Not to bring people, you know. It was just a present to give away. It was not like a -- a promotion to get people around to -- to go.

13:23:51 8

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13:24:01 11

It was more like they were at the show when it was opened, and they could walk with it.

13:24:04 12

24:11 13

Q. So it's your belief that the postcards were never given away outside of the building where the show was held?

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A. I don't know. You know, I don't -- you know, I mean, I cannot recall when you have 40 or 50 different postcards. There is some people -- like I said, there is some people who would take a stack of 50 and -- at a time, you know.

13:24:21 17

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You know, it's like -- it was not like a -- a watch dog or security to say don't take any postcard. Everything was open and -- and free. So if some people would grab a bunch and give it away left and right, why not? You know.

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